

LEONARDO M. ALDRIDGE

Attorney-At-Law
66 Willoughby St., Floor 2
Brooklyn, NY 11201

MEMO ENDORSED

December 21, 2020

12/22/20
granted

Colleen McMahon

BY ECF

Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: U.S. v. Richard Lotito, Cr. No. 20-675

Your Honor:

Mr. Richard Lotito respectfully requests that his bail conditions be modified so that he can tend to his business, Planet of the Vapes, located at 901 Huguenot Ave., Staten Island, N.Y., 10312. Mr. Daniel Wolf, the Assistant United States Attorney assigned to this case, relayed to me that the Government does not oppose this request, subject to the U.S. Pretrial Services Office verifying employment, location, and other information.

Mr. Lotito's livelihood currently depends on the income generated by the vape shop, which is currently administered by Mr. Lotito's common-law wife and his daughters. For these reasons, Mr. Lotito, with no objection from the Government, requests that the conditions of his bail release be modified so that he can tend to his vape shop business.

Respectfully,

S/Leonardo M. Aldridge
CJA Counsel for the Defendant

Cc. AUSA Daniel Wolf (through e-mail)

USDC SDNY
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